Fuel Price and Volatility Risks for Big Stone II and Alternatives

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presented to the South Dakota Public Utilities Commission

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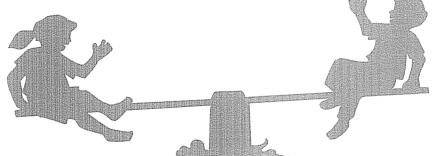
Summary: Applicants' Exhibit 31



My Testimony is about Trade-offs

What are the potential costs of future greenhouse gas regulation?

What are the cost and other risks of <u>not</u> using coal at Big Stone II?

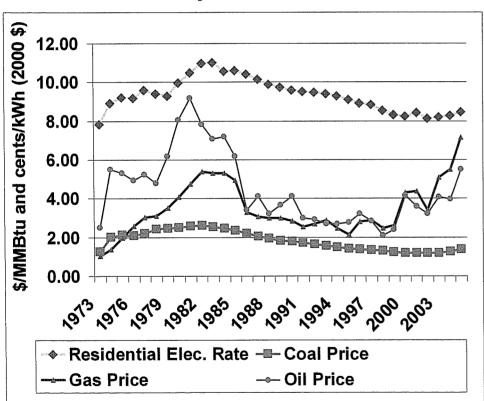


Capacity alternatives to Big Stone II generally entail natural gas, either as a primary or backup fuel supply.

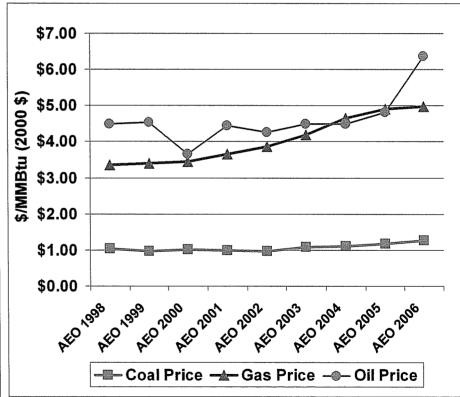
- Risks of higher prices
- Greater price volatility
- Health, safety, and longevity impacts of higher prices

Natural gas prices are high, and heading higher

Average U.S. Residential Electric Rates and Utility Fuel Costs, 1973-2004

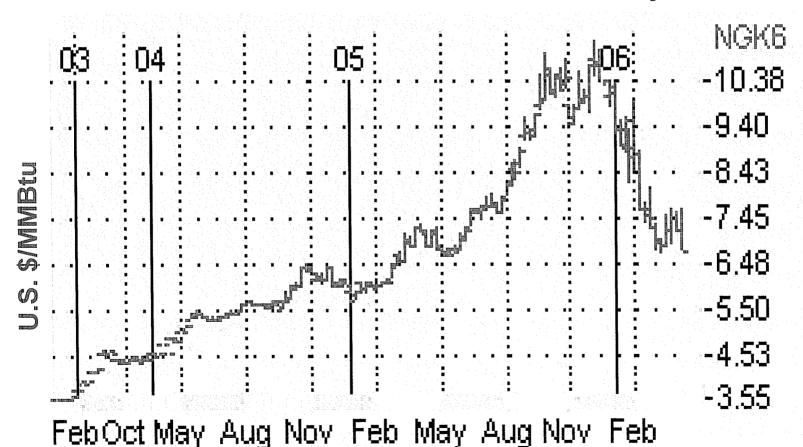


2020 Forecasts of Electric Power Sector Fossil Fuel Prices, Compiled from *AEO* 1998-2006



Much greater volatility in natural gas prices compared to coal

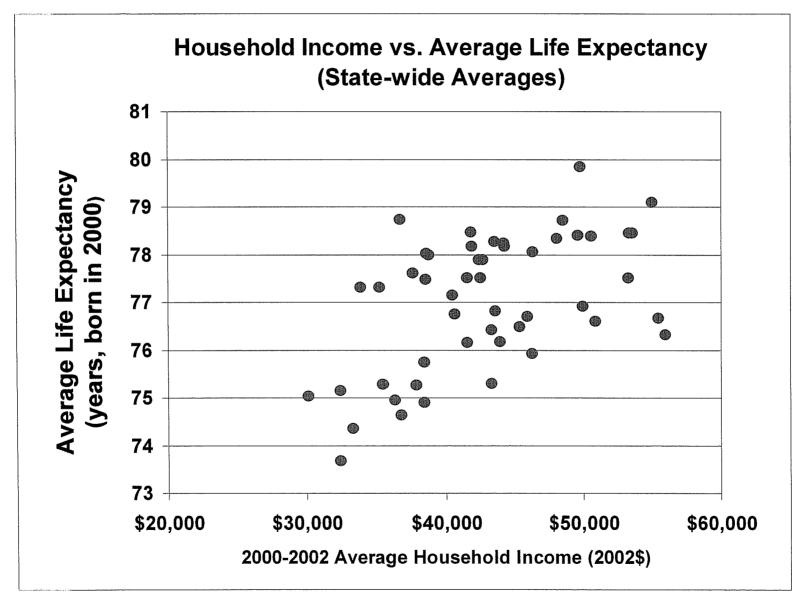
Natural Gas Futures: Contract Detail for May 6, 2006



High natural gas prices and price volatility pose risks for electricity generators

- For 600 MW of gas combined cycle:
 - o 1¢ change in gas prices \rightarrow \$300,000/year
 - o \$1.00/MMBtu or more → tens of \$millions/year
- Higher fuel prices are linked to health impacts
 - o higher costs for generating power
 - o higher rates for customers
 - o less household income for other purposes
 - curtailment in health and safety spending
 - o greater chance of premature death

"Wealthier is healthier"



Additional considerations: South Dakota

- SD counties to be served by Big Stone II have lower than average household income
- SD households have higher than average consumption of gas and oil
 - o Households doubly vulnerable to gas price volatility
 - o Coal use at Big Stone II would moderate price spikes in family energy budgets
- These factors suggest that SD impacts on health, safety, & longevity would be greater than national averages